

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

**HEALTH DIAGNOSTIC
LABORATORY, INC., et al.,**

Debtors.¹

**Case No. 15-32919 (KRH)
Chapter 11**

**NOTICE OF (A) MOTION FOR EXPEDITED HEARING
AND TO SHORTEN THE NOTICE PERIOD ON THE LIQUIDATING
TRUSTEE'S MOTION AND (B) MOTION OF THE LIQUIDATING TRUSTEE
FOR ORDER (I) AUTHORIZING THE TRANSFER OF DEBTORS' PATIENT
RECORDS TO METALQUEST, INC. AND (II) APPROVING THE PROPOSED
AGREEMENT BETWEEN THE LIQUIDATING TRUSTEE AND METALQUEST**

PLEASE TAKE NOTICE that on May 16, 2024, Richard T. Arrowsmith, in his capacity as Liquidating Trustee (the "Trustee") of the HDL Liquidating Trust (the "Trust"), by his undersigned counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the "Bankruptcy Court"): (A) *Motion of the Liquidating Trustee for an Expedited Hearing and to Shorten the Notice Period on the Motion of the Liquidating Trustee for Order Authorizing the Transfer of Debtors' Patient Records to MetalQuest, Inc. and (II) Approving the Proposed Agreement Between the Liquidating Trustee and MetalQuest*, and (B) *Motion of the Liquidating Trustee for Order Authorizing the Transfer of Debtors' Patient Records to MetalQuest, Inc. and (II) Approving the Proposed Agreement Between the Liquidating Trustee and MetalQuest* (the "**Motions**"), wherein the Trustee seeks an expedited hearing on his Record

¹ The Debtors along with the last four digits of their federal tax identification number, are Health Diagnostic Laboratory, Inc. (0119), Central Medical Laboratory, LLC (2728), and Integrated Health Leaders, LLC (2434) (referred to herein collectively as "HDL").

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*Counsel for Richard Arrowsmith, Liquidating
Trustee of the HDL Liquidating Trust*

Transfer Motion², which requests an order, inter alia, authorizing the Liquidating Trustee to transfer the Records to MetalQuest, Inc.

PLEASE TAKE FURTHER NOTICE that copies of the Motions may be obtained at no charge at www.americanlegal.com/HDL or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that a hearing will be held on **May 23, 2024, at 11:00 a.m.** (prevailing Eastern time) using the information below. True and complete copies of the Motions are served contemporaneously herewith.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE THAT if you do not want the Court to grant the relief sought in the Motions, or if you want the Court to consider your views on the Motions, then by **May 22, 2024**, you or your attorney must:

1. File with the Court, either electronically or at the address shown below, a written response pursuant to Rule 9013(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

2. You must also serve your written responses on the following counsel for the Trustee. You must serve the written responses early enough so that such counsel will received it on or before **May 22, 2024**:

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Motions.

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For the avoidance of doubt, electronic service in accordance with rule 5005-2 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Court's Electronic Case Files Policy will be deemed valid and effective service under the Procedures Orders.

3. You must also attend a hearing on the Motions to be held before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, scheduled on **May 23, 2024, at 11:00 a.m. (Eastern Time)** in the United States Bankruptcy Court, 701 East Broad Street, Courtroom 5000, Richmond, Virginia 23219.

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Motions as conceded, and enter appropriate orders granting the requested relief without further notice or hearing.

Dated: May 16, 2024

Respectfully submitted,

/s/ Brittany B. Falabella

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